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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 RAMON DESAGE, aka RAMON ABI-
15 RACHED, aka RAYMOND ANTOINE
ABI-RACHED,

16 Defendant.

2:13-CR-039-JAD-VCF

**Government's Unopposed Motion to
Extend Time to File its Response to the
Motion to Intervene by Harvey Vechery
(ECF No. 361)
(First Request)**

ECF No. 365

17 This Motion to Extend Time is the first request. LR IA 6-1.

18 The United States of America respectfully moves this Court for an Order extending
19 the time for the government to file its Response to the Motion to Intervene by Harvey
20 Vechery (ECF No. 361). Undersigned counsel has a large case load. The government needs
21 more time to review the document and records to file an appropriate response while still
22 meeting the deadlines for other assigned cases. The Response to the Motion to Intervene for
23 William Richardson is currently due November 21, 2019. The government now requests an
24 extension to, and including, November 21, 2019, for Vechery as well.

25 On October 31, 2019, the government called Patricia Lee, counsel for Harvey
26 Vechery, to request an extension of time to November 21, 2019. On November 1, 2019,
27 counsel agreed to the extension of time.

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1 Because of the foregoing reasons, the government requests and extension of time to
2 review the filed documents.

3 This Motion is not submitted solely for the purpose of delay or for any other
4 improper purpose.

5 This Court should grant an extension of time to, and including, November 21, 2019.

6 DATED: November 6, 2019.

7 NICHOLAS A. TRUTANICH
8 United States Attorney

9 /s/ Daniel D. Hollingsworth
10 DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

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12 IT IS SO ORDERED:

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15 HONORABLE JENNIFER A. DORSEY
16 UNITED STATES DISTRICT JUDGE

17 DATED: 11/13/2019
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